

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

TRILLER, INC., Plaintiff, v. BYTEDANCE LTD., BYTEDANCE, INC., TIKTOK, INC., AND TIKTOK PTE. LTD., Defendants.	Case No. 6:20-cv-00693-ADA JURY TRIAL DEMANDED Judge Alan D. Albright
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**TRILLER’S SECOND NOTICE REGARDING
DEFENDANTS’ JOINDER IN MOTION TO TRANSFER**

On November 19, 2020, defendant ByteDance Ltd. (“BDL”) filed a motion to dismiss under Rule 12(b)(2). [ECF No. 29](#). On the same day defendant TikTok, Inc. (“TTI”) filed a motion to dismiss under Rule 12(b)(3) or in the alternative to transfer to the Northern District of California. [ECF No. 30](#). On November 24, 2020, Plaintiff Triller, Inc. (“Triller”) filed a First Amended Complaint. [ECF No. 32](#). The First Amended Complaint answered the objections raised by Defendants’ motions, adding considerable details regarding jurisdiction and venue. The First Amended Complaint also added ByteDance, Inc. (“BDI”) and TikTok pte. Ltd. (“TTPL”) as defendants. On January 8, 2021, Defendants Answered the FAC. [ECF No. 41](#).

On January 13, 2021, Defendants advised that they “plan[ned] to file a renewed 1404(a) Motion to Transfer on behalf of all Defendants, which will replace and/or moot the previously filed motions.” [ECF No. 44](#) (Case Status Readiness Report), at 2. On January 22, 2021, the Defendants filed their renewed Motion to Transfer by joining in the previously filed motion. [ECF No. 45-1](#).

Triller intends to take venue discovery and notifies the Court it will respond to the Defendants' renewed Motion to Transfer within two weeks of completion of venue discovery in accordance with the Court's Standing Order Regarding Venue and Jurisdictional Discovery Limits for Patent Cases. Pursuant to that Order, the Court has authorized the use of interrogatories, requests for production, requests for admission, and depositions to inform the issues underlying venue and jurisdictional disputes.

Under the Court's Order, venue and jurisdictional discovery should be completed no later than six months after the filing of the initial motion[s], with responses to venue and jurisdictional motions due two weeks after discovery is complete. Pursuant to the Court's Order, on November 24, 2020, Triller served discovery on all Defendants regarding issues related to their Motion to Transfer.

DATED this 29th day of January, 2021.

Respectfully submitted,

/s/ Brian N. Platt

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CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of January, 2021, I electronically filed the foregoing using the court's CM/ECF filing system which served all parties of record.

/s/Brian N. Platt